From: Stephanie Baima <stephaniebaima18@gmail.com>
Sent: Monday, October 26, 2020 5:57 PM
To: MORASH, MELANIE
Subject: Public Comment for Proposed Olin Cleanup Plan

Dear Melanie,

Please find my comments on the proposed cleanup plan for the Olin site below.

Thank you,
Stephanie Baima
14 Kelley Rd
Wilmington, MA 01887

Dear Olin team at EPA,

Thank you for your attention to the Olin superfund site and work developing this proposed cleanup plan. As a 30-year-old, it is gratifying to see the beginnings of tangible progress towards the cleanup and remediation of this site whose issues I have been hearing about my entire life. However, this feeling is tempered by the glacial pace of progress the community has witnessed historically. For me this has resulted in the complete devaluation of any opinions or preferences expressed by Olin or any other PRPs who have drawn out the process always seeking to distance themselves from culpability and insulate themselves from responsibility. Since the Superfund Program is supposed to "make the polluters pay," I want to see this happen, and at a level of efficacy and with a price tag that the PRPs hold no sway over. I've organized my remaining commentary by topic:

- Containment Area and Groundwater - The functionality of the CA and its relationship with the groundwater has yet to be determined. Therefore, I believe the choice of alternative is inappropriate at this time due to knowledge gaps. Can it be proved that the CA is functioning fully? If so, it could be capped once contaminated soils were collected in it, but if it is not, it would need to be fixed before capping or it itself would need to be excavated.
- DAPL/GWHS – I consider DAPL/GWHS-4 to be preferable to DAPL/GWHS -3 because it removes more of this source contaminant, by definition leaving less to continue to disperse, requiring more downstream (pun intended) remediation, not to mention ecological and human health consequences. This is of even greater relevance due to the knowledge gaps that exist surrounding the topography and condition of the bedrock. The 1,100ng/L target NDMA concentration in this alternative is still undesirable due to its disparity from target cleanup levels, so a 5,000ng/L NDMA target concentration is obviously even less appealing. I see the environmental impact of the additional wells as an acceptable price to pay for greater source contaminant removal, especially because the envisioned sites of the wells are in the same area as the others. This boils down to prevention always being better than cure; dealing more aggressively with contamination at the source necessarily lessens later interventions (likely more difficult and expensive as the contaminant spreads) required. Furthermore, it looks like there is a discrepancy in goals: where is the RAO that speaks to returning the ground water/aquifer to drinking water quality? EPA's expectations when developing remediation alternatives include "…to return usable ground waters to their beneficial uses wherever practicable, within a time frame that is reasonable…" Obviously the latter objective is out of reach, but that of restoring the quality of the ground water should not be lost, it needs to be included as an RAO. The groundwater situation was the very reason for the inclusion of the Olin site on the NPL, which further supports this request.

- Institutional Controls - EPA will please forgive residents of the town for not having faith in institutional controls, considering the historical record of site ownership and (in)action. One of the potential developers of the remediated site is the National Surface Transportation Board, which is not subject to local controls and oversight, just one example of how this could work out poorly. Institutional controls, per the EPA's own ranking of waste management options, should be the option chosen when there are no others, which is not the case here. Contaminated soil excavation to address TMPs is preferred as it is feasible: the disposal location could be offsite if necessary, or potentially within the containment area if this made more sense.
- LNAPL and SW – It looks like there has been mixed use of averages and 'not-to-exceed' limits. How is it appropriate to compare an average value to a 'not-to-exceed' limit when you could fail the limit with high individual readings taken from among those being averaged? This is relevant to the ammonia and chromium measurements, possibly among others, which are material to aquatic life in the wetlands, one of the areas of specifically solicited commentary (more in the next bullet).
- Wetlands – Due to preexisting determinations, for example those in the Water Quality Certification done by the US Army Corps of Engineers, intrusion upon wetlands is only acceptable in the case that the intrusion is temporary and for remediation activities only. It is understood that required remediation activities will impact the wetland areas of the site, however I think we must rely on post-cleanup restoration because sufficient extraction of contaminants will not be possible without some damage to the wetlands from drilling, excavation, service roads, etc. Our community knows the value of healthy, functioning wetlands and we deserve to see them restored to the greatest extent possible after decades of abuse and neglect.

Thank you,

Stephanie Baima
14 Kelley Road
Wilmington, MA 01887